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May 2, 2025

VIA ECF

Hon. Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080 | Bi-weekly status report

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks ending April 25 and May 2. We have also attached a current list of pending motions.

1. Plaintiffs and the Manufacturer Defendants reached an agreement on search terms.
2. Plaintiffs conferred with certain Defendants regarding discovery responses and custodians and search terms.
3. Defendants conferred with certain Plaintiffs in the State Attorney General Track regarding their PFS responses and document productions.
4. The parties agreed to a schedule for briefing common deficiencies in Self-Funded Payer Track Plaintiff Fact Sheet responses. ECF No. 530.
5. Plaintiffs filed a Motion to Compel Responses to Compass Lexecon Subpoena to Produce Documents. ECF No. 522. The parties and Non-Party Compass Lexecon have filed an agreed-on schedule for filing opposition and reply papers. ECF No. 529.
6. The parties have had numerous conferrals on the Privilege Protocol. Disputes have been narrowed, but the parties have reached an impasse on certain issues, which will require the Court's consideration. The parties will jointly submit a proposed briefing schedule to the Court in short order.
7. The parties have had numerous conferrals on the Privilege Protocol. Disputes have been narrowed, but the parties have reached an impasse on certain issues, which will require the Court's consideration. The Court granted the parties' proposed briefing schedule for submitting the remaining disputes. ECF No. 532.

Respectfully submitted,

/s/ Matthew F. Gately

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/s/ Joanne Cicala

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Encl.

cc: Hon. Rukhsanah L. Singh, U.S.M.J.

All counsel of record